



# Letter of Appeal - Request for Review CC Docket No. 02-6

Attn: Marlene H. Dorch, Secretary Federal Communications Commission Office of the Secretary 9300 East Hampton Dr Capitol Heights, MD 20743

Decision Document: Administrator's Decision on Appeal 3/31/2015

Funding Year: 15 (2012 - 2013)

BEN: 201170 471 #: 87118 FRN: 2375935

SPIN: CamNet, Inc. 143017447

From: CamNet Inc. (SPIN# 143017447)

Contact: Andrea Preston Email: andrea@camnet.us Telephone: (505) 761-4500

Re: Naa tsis'Aan Community School (BEN: 201170)

PO Box 10010 Tonalea, AZ 86044 Contact: Elizabeth Rule

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Telephone: (928) 672-2335

Invoice Extension for FRN 2375935

471: 871188

## **Decision Document:**

Administrator's Decision on Appeal 3/31/2015.

# Administrator's Decision on Appeal Explanation:

Administrative procedures related to the payment of support for discounted services establish deadlines for applicants of service providers to submit invoices to USAC. The administrator provides an extension of the deadline under certain conditions. Those conditions are documented in the

Reference area on the USAC website. (See invoice Extensions for more information.) Your request did not provide information that satisfied those conditions.

CamNet Inc. is requesting the FCC please overturn USAC's decision to deny this FRN. Due to a Special Review of a number of our schools, USAC withheld payment of our invoices for 17 months. (We would like to note that the review is complete and in the last four weeks, USAC has released payments thus far on over half of the original balance due) During that time, USAC advised us to file invoice extension requests on all items that were not closed out. USAC also let us know that submitting any additional invoices during the Special Review may extend the review out further. Per their advice we generated a form letter and submitted Invoice Extension Requests for all our open accounts.

USAC has approved of our reasoning to extend a large portion of those requests. (Please see the list below and supporting documentation showing the same reason was used.) However, FRN 2375935 was denied because "The administrator provides an extension of the deadline under certain conditions. Those conditions are documented in the Reference area on the USAC website. (See invoice Extensions for more information.) Your request did not provide information that satisfied those conditions". As this review was out of our control, as well as our clients', we followed the procedures recommended by USAC so it should follow that the extension would be granted. It is unclear why some extensions were denied and USAC has not been able to provide any further reasoning leaving it to seem that it was a subjective decision and dependent on the reviewer looking at the case rather than being consistent and taking into account that USAC was holding our accounts beyond the deadlines.

### Funding Year 2012: FRN 2321911

Applicant BABOQUIVARI UNIFIED SCH DIST 40, AZ (BEN: 143102)

Service Category Internal Connections

Changes - Last Date to Invoice changed from '01/28/2015' to '07/24/2015'

- FRN 2321911 added to SLD FRN Extension table

## Funding Year 2012: FRN 2338308

Applicant BORREGO PASS SCHOOL, NM (BEN: 99169)

Service Category Basic Maintenance

Changes - Last Date to Invoice changed from '10/28/2014' to '07/24/2015'

- FRN 2338308 added to SLD FRN Extension table

#### Funding Year 2012: FRN 2338324

Applicant BORREGO PASS SCHOOL, NM (BEN: 99169)

Service Category Basic Maintenance

Changes - Last Date to Invoice changed from '10/28/2014' to '07/24/2015'

- FRN 2338324 added to SLD FRN Extension table

#### Funding Year 2012: FRN 2359264

Applicant HAVASUPAI SCHOOL, AZ (BEN: 98793)

Service Category Internal Connections

Changes - Last Date to Invoice changed from '01/28/2015' to '07/24/2015'

- FRN 2359264 added to SLD FRN Extension table

### Funding Year 2012: FRN 2383757

Applicant BLACK MESA COMMUNITY SCHOOL, AZ (BEN: 98814)

Service Category Basic Maintenance

Changes - Last Date to Invoice changed from '10/28/2014' to '07/24/2015'

- FRN 2383757 added to SLD FRN Extension table

Our original Invoice Extension Request was submitted prior to the deadline of 10/28/2014 and our justification is based on USAC holding payment for an excessive amount of time on completed work. Because the holdup is outside of our control, as well as our clients', this request is legitimate and the deadline should be extended.

Thank you,

Andrea Preston Office Manager CamNet, Inc.